## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES OF AMERICA,	§ 8	
vs.	8 8 8	<b>CASE NO. 4:23-CR-218</b>
HARDIK JAYANTILAL PATEL	<b>§</b> §	

# DEFENDANTS HARDIK PATEL'S UNOPPOSED MOTION TO EXTEND SENTENCING DATE AND RELATED DEADLINES

Defendant Hardik Patel respectfully moves the Court to extend the current sentencing date of March 18, 2024 and related pre-sentencing deadline by 60 days, thereby resetting sentencing for May 17, 2024.

On May 17, 2023, a grand jury indicted Hardik Patel for conspiracy to commit mail fraud and wire fraud, mail fraud, and conspiracy to commit money laundering. (Doc. No. 1). On December 1, 2023, Patel pled guilty to Count 1 of the indictment, pursuant to a written plea agreement. (Doc. 41). The Court ordered the PSI to be completed by February 9, 2024, objections to the PSI to be filed by February 23, 2024, the final PSI to be completed by March 8, 2024, and sentencing set for March 18, 2024 (Doc. 43).

For the reasons set forth in the sealed attachment to this motion, defendant Hardik Patel respectfully requests that the sentencing dates set by the Court be extended by 60 days.

As stated in the below Certificate of Conference, counsel for the United States has no objection to the requested extension.

WHEREFORE, Hardik Patel respectfully requests this Court grant his motion for a 60-day extension of the previously-entered sentencing dates.

Respectfully submitted,

## **HOLLAND & KNIGHT, LLP**

By: /s/ Steven A. Block

Steven A. Block *Pro hac vice* 

Illinois Bar No. 6269433 Steven.Block@hklaw.com

150 N. Riverside Plaza, Suite 2700

Chicago, Illinois 60606 Telephone: (312) 715-5799 Facsimile: (312) 578-6666

Francie Trimble

Texas Bar No. 24126448 Francie.Trimble@hklaw.com 811 Main Street, Suite 2500 Houston, Texas 77002

Telephone: (713) 244-8205 Facsimile: (713) 821-7001

COUNSEL FOR DEFENDANT HARDIK PATEL

#### **CERTIFICATE OF CONFERENCE**

I certify that undersigned counsel for Defendant Hardik Patel contacted the following counsel, who have stated that they are unopposed to Defendant Hardik Patel's Motion to Extend Sentencing Date and Related Deadlines: Stephanie Bauman, counsel for the United States.

/s/ Steven A. Block Steven A. Block

### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this above and foregoing document was served via ECF on this <u>29th</u> day of January, 2024.

/s/ Steven A. Block
Steven A. Block